

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

SKYSONG INNOVATIONS, LLC,

§

Plaintiff,

§

C.A. No. 2:25-cv-00098-JRG

v.

§

JURY TRIAL DEMANDED

FORTINET, INC.,

§

Defendant.

§

**UNOPPOSED MOTION TO EXTEND
DEFENDANT'S TIME TO RESPOND TO COMPLAINT**

Plaintiff Skysong Innovations, LLC (“Plaintiff” or “Skysong”), on behalf of Defendant Fortinet, Inc. (“Defendant” or “Fortinet”), respectfully moves the Court, pursuant to Federal Rules of Civil Procedure 6 and 7, Local Rule 7, and the Court’s inherent authority, for a 60-day extension of time for Defendant to respond to Plaintiff’s Complaint, up to and including May 19, 2025.

In support of this Motion, Plaintiff states as follows:

1. Plaintiff filed its Complaint on January 31, 2025. (Dkt. No. 1). Defendant’s response is currently due on or before March 18, 2025.
2. The Parties have had discussions regarding the case and potential narrowing of issues.
3. In light of those discussions, Defendant has requested an extension of up to 60 days to respond to the Complaint. Accordingly, Defendant requests that the deadline for it to answer or otherwise respond to the Complaint be extended to Monday, May 19, 2025.
4. Plaintiff does not oppose this request.
5. This request is made in good faith and not for the purpose of delay.

6. Plaintiff submits this Motion on Defendant's behalf, pending defense counsel's formal entry of appearance.

The Parties respectfully request that the Court grant this Motion and enter an Order extending Defendant's deadline to respond to the Complaint to May 19, 2025.

A proposed order is submitted herewith.

DATED: March 5, 2025

By: /s/ Cecil E. Key
Cecil E. Key
Jay P. Kesan
KEY KESAN DALLMANN PLLC
1050 Connecticut Avenue, N.W. Suite 500
Washington, DC 20036
Telephone: (202)772-1100
cecil.key@kkd-law.com
jay.kesan@kkd-law.com

*Attorneys for Plaintiff
Skysong Innovations, LLC*

CERTIFICATE OF CONFERENCE

The undersigned hereby certifies that on March 4, 2025, counsel complied with the meet and confer requirement in Local Rule CV-7(i). This motion is unopposed.

/s/ Cecil E. Key
Cecil E. Key

CERTIFICATE OF SERVICE

I certify that on March 5, 2025, I electronically transmitted the foregoing document via email to the following attorneys for Defendant at the address listed below:

Scott Atkinson
Vice President of Litigation and Compliance
Fortinet, Inc.
909 Kifer Rd.
Sunnyvale, CA 94085
Email: satkinson@fortinet.com

/s/ Cecil E. Key

Cecil E. Key